

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

JOHN SCOTT JORGENSEN
PRO SE

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

LYNCHÉ NEWMAN LAW
19 VINCENT DAMARISCOTTA
MAINE 04543 SEE BELOW

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

ROBERT GREGORY LAW FIRM
KATHY JORGENSEN

Complaint for a Civil Case

Case No. **CV 24 7452**
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

DONNELLY, J.

LOCKE, M. J.

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ OCT 25 2024 ★

LONG ISLAND OFFICE

REC'D IN PRO SE OFFICE
OCT 25 '24 AM 10:18

RECEIVED

OCT 25 2024

EDNY PRO SE OFFICE

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name JOHN SCOTT JORGENSEN
 Street Address ~~1811 BEECH ST~~
 City and County ~~WARRUMBAH TOWNSHIP / LINCOLN~~
 State and Zip Code ~~MAINE~~
 Telephone Number 115 MONTAUK HWY / SUFFOLK CT
 E-mail Address jorgensen.jhj@gmail.com
631-469-8220

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name LINCH & NEWMAN LAW
 Job or Title 19 VINE ST
 (if known)
 Street Address DAMARISCOTTA
 City and County LINCOLN COUNTY
 State and Zip Code MAINE 04543
 Telephone Number _____
 E-mail Address _____
 (if known)

Defendant No. 2

Name ROBERT GREGORY LAW
 Job or Title PRES
 (if known)
 Street Address 10 WATER ST
 City and County DAMARISCOTTA MAINE
04543 LINCOLN
COUNTY

State and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known)

Defendant No. 3

Name KATHY JORGENSEN
 Job or Title INDIVIDUAL
 (if known)
 Street Address City 1723 APACHE ST
 and County State DARE (??) COUNTY
 and Zip Code KILL DEVIL NC
 Telephone Number 336-512-0097
 E-mail Address _____
 (if known)

Defendant No. 4

Name _____
 Job or Title _____
 (if known)
 Street Address City _____
 and County State _____
 and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

DIVERSITY OF CITIZENSHIP

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

HARVARD LAW REVIEW, 137 @ P1226

MARSHALL V MARSHALL 547 U.S. 293 (2006)

MILLER LAW, MICHIGAN, TORTIOUS

INTERFERENCE

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a.

If the plaintiff is an individual

The plaintiff, (name) JOHN S. JONSENSEN PRO SE, is a citizen of the State of (name) NEW YORK.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a.

If the defendant is an individual

ROBERT GREGORY

The defendant, (name) LYNN NEWMAN, is a citizen of the State of (name) MAINE. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) LYNCH & NEWMAN, is incorporated under the laws of the State of (name) MAINE, and has its principal place of business in the State of (name) MAINE. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

5 MILLION DOLLARS
LYNCH & NEWMAN ANNUAL INTAKE

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

MY BROTHER & SISTER EMBELLED
\$150,000.00 OF MOM'S MONEY THEN
SUBMITTED IT TWO 2 LAW FIRMS MENTIONED
ABOVE. THE RESULT WAS A DISPUTE
OF MOM'S WILL. THE EXECUTOR
DISQUALIFIED HIMSELF

JSJ 10/25/2024

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

5 MILLION DOLLARS IS LYNCH
NEWMAN'S ANNUAL INCOME.
PUNITIVE DAMAGES ARE UP TO
THE E.D.N.Y.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 25 OCT, 2024

Signature of Plaintiff

Printed Name of Plaintiff

John Scott Jorgensen
JOHN SCOTT JORGENSEN

APPLICATION FOR INDEX NUMBER

CASE

This lawsuit challenges the TORTIOUS INTERFERENCE
By these two law firms and my sister
Kathy which resulted in dividing

the assets of THE ESTATE of ALICE PEARSON
JORGENSEN between 2 parties ;

Peter Jorgensen
and
Kathy Jorgensen

Instead of three , leaving out John Scott Jorgensen ,
your Plaintiff .

Legal Authorities cited are : Harvard Law Review ;
Federal Courts , 137 Harvard Law Review 1226 ,
Volume 137 , Issue 4 , February , 2024 .

Marshall v Marshall , 547 U.S. 293 . (2006) .

1). Miller Law , Michigan , sets forth six
conditions for proving Tortious Interference .

- A) The Plaintiff had a Contract with a third party
- B) The Defendants knew about the contract at the
time of the alleged interference .
- C) The Defendants interfered intentionally .
- D) The Interference was improper .
- E) The Defendants conduct led to a Breach
of Contract .
- F) The Plaintiff suffered damage as a result .

2). Miller Law , Michigan . In Re ; AIG , 2008
Securities Litigation , United States District Court ,

Southern District of New York , Case # 08-CV-04772
(Co - Lead Counsel)

3) The Plaintiff had a Contract with a third party .
Decedent Alice Pearson Jorgensen
left her Last Will and Testament .
Alice's Will named three beneficiaries : Kathy ,
John and Peter Jorgensen .

4) The Defendants knew about the Contract at the time
of the alleged interference . The Defendants attempted to
Probate Alice's Will naming Peter as the executor .

5) The Defendants interfered intentionally . Only two
beneficiaries were paid by the two law firms
mentioned above : Peter and Kathy .

6) The Interference was improper . Peter and Kathy
had written themselves checks from Alice's bank accounts
while Alice was under their care . Kathy wrote herself
a \$100,000.00 dollar check and Peter , following his
sister ,
wrote himself a \$ 50,000.00 dollar check . Alice countered
by immediately changing her monies to accounts out of
Peter
and Kathy's reach . On September 30 , 1999 , Alice
leased
apartment # 908 at Coburg Village located at Rexford ,
New York , 12148 . Alice stayed at Coburg Village
until just after her 90th birthday on July 26 , 2011 .

30 SEP 1999 til 20 AUG 2011 is

P.3

11 years 10 mos.
20 days 591 29 OCT 24

Alice passed June , 2012 .

At Alice's 90th birthday party , the Defendants Peter and Kathy revealed that they had made arrangements for moving Alice to an insane asylum, High Point located near Saratoga , New York .

Starting as a page , back in the 1970s ,

Alice took a job at the Huntington Public Library and improving her education at C.W. Post College located in Upper Brookville , New York , obtaining

a Degree as Master of Library Sciences , retiring as Head Of the Reference Department at the Huntington Public

Library . 23 years as a Public Servant , with a Civil Servants

Employees Association (CSEA) retirement insurance account

which should have stayed with Alice for life . Our impatient

beneficiaries , Peter and Kathy , were so impatient that they took no action in maintaining Alice's CSEA insurance in their haste to get rid of Alice and get her money . This failure to maintain Alice's CSEA insurance is sufficient to trigger the provision in Alice's Last Will which is written to make Plaintiff John Jorgensen as the rightful Executor in Alice's Estate .

When Peter and Kathy moved Alice to the insane asylum , Alice rebuffed them with the words "I'm not staying here", right to their faces . I returned the refrigerated tractor trailer to Higganum Connecticut

in order to assist Alice with her predicament .

A move to 1575 State Route 129 , a house Alice and I previously purchased was elected as a remedy compared to an insane asylum . See : 2:23-CV-00333-NT

as a reference . U. S. District Court in Maine , Portland . At the time Alice and I moved to Maine , I had no Idea Peter and Kathy had embezzled \$150,000.00 from Alice's accounts . Peter and Kathy , by passing on Alice's large sum of money to the Lynch and Newman law firm at the town of Damariscotta , Maine , John Lynch and Matthew Newman enlisted the help of the lawyer Robert Gregory , who had received Alice's and my money for the generation of quit claim deeds for the property at South Bristol , Maine . I trusted Robert Gregory , which turned out to be greivous error . Robert Gregory had a stronger allegiance to Alice's money and thereby created a Conflict of Interest to make Peter and Kathy's wishes prevail . Robert Gregory's Fiduciary Interest to me was a negative number including theft of stocks and bonds and theft of Alice's savings account . The Conflict Of Interest created by attorney Robert Gregory was shared by attorneys John Lynch and Matthew Newman which makes them Complicit .

7) The Defendant's conduct led to a Breach of Contract . I had the lamentable experience of witnessing Robert Gregory turn himself into a bald faced liar at the Board

of Overseers of the Bar , Augusta , Maine ,
when Gregory denied changing a copy of my signature
on a blank sheet of paper into a document
designed to create a debt chargeable to me .
Board of Overseers Complaint # GCF 22-086 .
Although erstwhile Gong Show Hostess
Audrey Braccio dismissed my Complaint based
on a laches defense , the fact is a laches defense
is not available to someone who stands
with Unclean Hands . Robert Gregory implied that
what I saw with my own eyes was not true .
A Breach of Contract is unmistakable
in the case at bar .

8) The Plaintiff suffered damage as a result .
One third or \$150,000.00 is \$50,000.00 Dollars .
All of Alice's Stocks and Bonds should
have been tendered to Your Plaintiff , the
only requirement thereof is being named
as a beneficiary in Alice's Will . Robert
Gregory seized all of Alice's Stocks and
Bonds to be given to Peter and Kathy ,
Approximately 50 Thousand Dollars worth .
The passage
of time has interfered with my ability to
become a tractor trailer owner operator .
5 to 7 Thousand Dollars a week potential .
These old bones are not what they used to be !

Plaintiff Prays for the assistance of the Pro Bono

Department at the Central Islip Courthouse ,
Compensatory and Punitive Damages ,
and such other and further damages as to This
Court may seem Just and Proper .

John Scott Jorgensen

John Scott Jorgensen 24 Oct 24

Sworn to before me this _____ day of _____,
2024 .

NOTARY PUBLIC

· JOHN SCOTT JORGENSEN
· 115 MONTAUK HWY
· EAST MORiches N.Y. 11940
· 631-469-8220
· jorgensenjsj@gmail.com

RECEIVED
LINCOLN COUNTYSTATE OF MAINE
LINCOLN COUNTY

APR 19 2013

PROBATE COURT
Docket No. 2012-0221

PROBATE COURT

IN RE: ESTATE OF
ALICE P. JORGENSENAGREEMENT BETWEEN
BENEFICIARIES PURSUANT
TO 18-A M.R.S.A. § 3-912

This agreement made this 9th day of February, 2013 by and between the undersigned parties, being all the residual beneficiaries under Article THIRD of the Holographic Last Will and Testament of Alice P. Jorgensen, amended by her handwriting on July 15, 1979 and April 26, 1989 (the "Will"). The undersigned Parties hereby state as follows:

WHEREAS,

1. Alice P. Jorgensen (the "Decedent") died testate on June 6, 2012.
2. The Decedent's Will was duly admitted to Probate in the Lincoln County Probate Court on August 9, 2012.
3. At her death, the Decedent was survived by three (3) adult children, Peter B. Jorgensen, Anne K. Jorgensen, and John S. Jorgensen ("the Parties").
4. Article THIRD of the Will provides as follows:

"All the rest, residue and remainder of my property and estate, of every nature and description and wheresoever situate [sic], of which I may die seized or possessed, or over which at the time of my death I may have power of appointment or disposition, I give, devise and bequeath to my children, Anne K., John and Peter...."

NOW THEREFORE, the parties hereby state and agree as follows,

5. Decedent intended her estate be equally distributed to her children, undersigned Parties.

6. John S. Jorgensen received certain non-probate assets of the Decedent not received by either of his siblings

7. To achieve the equitable distribution of assets sought by the Decedent, John S. Jorgensen hereby waives any right to his share of the Decedent's probate assets. Therefore, all of the Decedent's probate assets shall be equally divided between the Decedent's son, Peter B. Jorgensen and the Decedent's daughter Anne K. Jorgensen.

I DISPUTE THIS BECAUSE IT CHALLENGES
DECEDENT'S WILL A GRATUITOUS
ARBITRARY STATEMENT LACKS FACTUAL PARTICULARITY
J.S.J.

J.S.J.
24 OCT 24
P. 9

8. The undersigned parties intend that this Agreement bind them and their respective successors in interest pursuant to the Maine Probate Code, 18-A M.R.S.A. § 3-912.
9. Each of the undersigned parties hereby acknowledge that he or she has either retained the advice of independent legal counsel prior to entering into this Agreement or has voluntarily waived his or her right to do so.

WHEREFORE, the parties have set hereon their respective hands and seals on the dates indicated below.

Date

2/9/2013

Date

Feb 5, 2013

Date

John S. Jorgensen

Peter B. Jorgensen
Peter B. Jorgensen

Anne K. Jorgensen
Anne K. Jorgensen

STATE OF MAINE

Lincoln County, ss:

Date: _____ 2013

Then personally appeared, before me, the above named John S. Jorgensen and acknowledged the foregoing instrument to be his free act and deed,

Notary Public

Print or Type Name

N.B. PETER HAS FORFEIT HIS
POSITION AS EXECUTOR AS OF
AUG 20, 2011
JSS 24 OCT 24
P. 10
P. 10

I, ALICE PEARSON JORGENSEN, residing at 20 Preston Street, Huntington, New York, do hereby make, publish and declare this to be my Last Will and Testament, hereby revoking all other wills and testaments and codicils thereto by me at any time heretofore made, and intending hereby to dispose of all my property and estate of every nature and description and wheresoever situate, and intending hereby to exercise all powers of appointment or disposition whatsoever that I may have.

FIRST: ~~I direct that my body shall be given to a military or private hospital, medical school or other similar institution selected by my Executor to be used in any manner and for any purpose as the institution may wish. My Executor should effect the immediate delivery of my body to such institution in the event that the institution may desire to use one or more organs of my body for transplant purposes. If my Executor is unable to locate an institution which will receive my body, then I direct that my body be cremated and my ashes be given a simple burial.~~

SECOND: I direct my Executor to pay all my just debts as soon after my decease as may be practicable.

THIRD: All the rest, residue and remainder of my property and estate, of every nature and description and wheresoever situate, of which I may die seized or possessed, or over which at the time of my death I may have power of appointment or disposition, I give, devise and bequeath ~~to my husband, JOHN BERNHARDT JORGENSEN, and in the event that they shall predecease me, or we shall both perish in a common disaster or under such circumstances as to render it difficult to determine who predeceased the other, then I give, devise and bequeath such property to my issue in~~ ^{children, Anne K, John and Peter} ^{SURVIVING}

23
7/11/7
a g
4/15/8

11

5

equal shares per stirpes. In the event that I shall die without issue
me surviving, then I give, devise and bequeath ~~one-half (1/2)~~ ^{all} of the said
rest, residue and remainder of my property and estate to ~~my brother-in-law,~~ ^{my brother,}
~~Edward H. Pearson, residing at San Rafael, CA 94902.~~
~~RALPH E. JORGENSEN, residing at Point Street, Watrick, Massachusetts.~~
~~If Edward H. Pearson~~
~~IF RALPH E. JORGENSEN shall not survive me, then I give, devise and~~
~~bequeath the said one-half (1/2) of my said residuary estate to the then~~
~~living issue of RALPH E. JORGENSEN in equal shares per stirpes. I give,~~
~~Devise and bequeath one-quarter (1/4) of the said rest, residue and~~
~~remainder of my property and estate to my sister, LOIS P. CARSON, residing~~
~~at Strafford Wayne, Pennsylvania. I give, devise and bequeath the remain-~~
~~ing one-quarter (1/4) of such property to my brother, EDWARD H. PEARSON,~~
~~K. Cafe, Wentham, Mass. Seabrook, New Hampshire.~~
~~residing at San Jose, California.~~

FOURTH: All transfer, inheritance and estate taxes and death
duties, by whatever name called which are imposed upon or in relation to
any and all property (whether passing under this Will or not) which is
required to be included in my gross estate for the purpose of any estate
or death tax law, together with any interest or penalties which may be
assessed in connection with such taxes or duties, shall be paid as an admin-
istration expense out of my residuary estate without proration or apportion-
ment of any part of such taxes over the balance of my estate.

FIFTH: I nominate, constitute and appoint my ~~husband, JOHN~~ ^{sister Lois}
~~BERNARD JORGENSEN~~ ^{Pearson Carson}, as guardian of the person and property of my children
during their respective minorities. In the event that my said ~~husband~~ ^{sister}
shall predecease me, then I nominate, constitute and appoint as guardian in
his place and stead, my adult daughter, ANN KATHERINE JORGENSEN. I direct
that no bond or other security shall be required of any guardian named in
this, my Last Will and Testament, for the faithful performance of her or his
duties in any jurisdiction whatsoever.

Aug 7.12

Son, Peter B.

FIFTH
~~JORGENSEN~~ ~~SIXTH~~ I nominate, constitute and appoint my ~~husband, JOHN~~
~~BERNHARDT JORGENSEN~~, to be the Executor of this, my Last Will and Testament.

In the event that my said ~~husband~~ ^{Son} shall predecease me or shall fail to qualify as Executor hereunder, or having qualified, shall cease to act as such Executor before completing the discharge of ^{his} ~~his~~ duties hereunder, then

I nominate, constitute and appoint as Executor in ^{his} ~~his~~ place and stead, my son, John S. Jorgensen, residing at 20 Preston St. Huntington NY
~~20 S. Wacker, residing at Beacon Drive, Huntington, New York.~~ I direct

that no bond or other security shall be required of any Executor named in this, my Last Will and Testament, for the faithful performance of ^{his} ~~his~~ duties in any jurisdiction whatsoever.

SIXTH
SEVENTH: I authorize and empower my Executor in dividing, conveying or distributing my estate, to convey, transfer and pay over the same in kind or in cash, or partly in kind and partly in cash.

I authorize and empower my Executor to sell, exchange, partition or otherwise dispose of any property, real or personal, of which I may die seized or possessed, at public or private sale, for such purposes and upon such terms and conditions, including sales on credit with or without security, in such manner and at such prices as he may determine.

I authorize and empower my Executor to compromise and adjust any liability or claim of whatsoever kind which may be made against or exist in favor of my estate, upon such terms and in such manner as may seem advisable.

All of the power, authority and discretion herein given to my Executor shall devolve upon and may be exercised by ^{his} ~~his~~ successor.

IN TESTIMONY WHEREOF, I have hereunto set my hand and ^{Fingerprint} ~~seal~~ this

gsg 24 OCT 24
 DATA

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P. 17

26th April
18th July
19th day of ~~September~~ ^{July}
~~Seventy-eight~~
and ~~Eighty-nine~~.

As God is my witness.

Alice P. Jorgensen (L.S.)
Alice P. Jorgensen

Signed, sealed, published and declared by the above-named Testatrix, ALICE PEARSON JORGENSEN, as and for her Last Will and Testament, in the presence of us and of each of us, who, in her presence, in the presence of each other, and at her request, have hereunto subscribed our names as attesting witnesses the day and year last above written.

_____residing at _____

_____residing at _____

_____residing at _____

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21 OCT 24
JSL

-4-

DETH p. 8

12
nov 2022

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE - BANGOR

PLAINTIFF ; JOHN SCOTT JORGENSEN
Post Office Box 242 , South Bristol , Maine 045

ATTORNEY MALPRACTICE
1 . QUESTIONABLE DOCUMENTS
2 . DISPUTE OF WILL
Lincoln County Probate Court
Case Number 2012 - 0221
3 . CONFLICT OF INTEREST

KATHY JORGENSEN (ANNE KATHERINE JORGENSEN)
1723 Apache Street , Kill Devil Hill , North Carolina 27948

ROBERT GREGORY , law firm
10 Water Street , Damariscotta , Maine 04543

MATTHEW NEWMAN , Lynch and Newman law firm
19 Vine Street , Damariscotta , Maine 04543
with his partner ,

JOHN LYNCH , law firm 19 Vine Street , 04543

DEFENDANTS

1)
THE DEFENDANTS , acting individually
and as a group ,
by DISPUTING
The Last Will and Testament of
ALICE PEARSON JORGENSEN ,
wrongfully
and illegally deprived me ,
JOHN SCOTT JORGENSEN , of my
inheritance as provided by
ALICE PEARSON JORGENSEN'S
LAST WILL AND TESTAMENT ,
Lincoln County Probate Case

P.1

Docket # 2012 - 0221 .

The amount in question

being \$180 , 000 .00 .

(One hundred and eighty thousand Dollars ,
United States Currency) ,
plus other valuable considerations .

2)

The Defendants , with affirmative intent
to commit fraud , fabricated two real estate
documents , one LIEN against my real property
and a PROMISSORY NOTE , each seeking to deprive me
of Twenty Thousand Dollars .

(Twenty Thousand Dollars , United States Currency) .

3)

The LIEN does not bear an
original signature ,
also known as a wet signature ,
which is required on a
Real Estate Deed in Maine
and also a Probate Court Document .
A photocopy replica
of my signature is fraudulently placed
on the LIEN . n.b. :

I did not sign said LIEN .

FOR THE RECORD , I did not sign ANY
document , deed , lien , promissory note ,
settlement or agreement

OF ANY KIND for ANY DEFENDANT
in this forum . n.b. ATTORNEY
MALPRACTICE ,

4)

No Lien Deed such as the above in this forum
exists in the Lincoln County Registry of Deeds .

5)

The Promissory Note lacks a specific Due Date .
Further , a photocopy signature is attached
as a fraudulent effort to make the
Promissory Note binding . In Probate Court ,
an original signature also known
as a wet signature is required in Maine .

6)

Copy of Document of Lien attached .

7)

Copy of Promissory Note attached .

8)

The Defendants have CLEARLY DISPUTED
THE LAST WILL AND TESTAMENT of
ALICE PEARSON JORGENSEN , seeking
to divide my share as a Beneficiary
between Peter and Kathy Jorgensen ,
each receiving \$90,000.000 ,
(Ninety Thousand Dollars , United States Currency)
as a result .

JSS 24 OCT 24

JSS 24 OCT 24

JSS 24 OCT 24

P. 2

9)

Maine attorney

Kevin Weatherby's article in the

"Aging in Maine" periodical is reprinted here ,

the "In Terrorem" section

should be applied

to this forum

in light of the repetitious

and flagrant

reliance on intentional deception

brought before the Probate Court

by the Defendants in this forum .

10)

Ohio Expert Witness Heidi Harralson

has published books on forensic

handwriting , Heidi's

article discussing

original signatures ,

wet signatures ,

e signatures and the like

is attached as a courtesy to the Court .

'How Do You Prove Written Forgery" .

11)

An invitation to the Damariscotta attorneys

in this forum

can be made possible

should the Court

adopt a minimal diversity option .

12)

As a courtesy , E . Donald Elliot's article

"The Complete Diversity Requirement for

Federal Jurisdiction : " is attached

for all to review .

I could not agree more with

Yale Professor Elliot's suggestions ,

which would open up the

fairness advantage of Federal Courts

to litigants seeking

"a home court advantage"

in state court .

13)

I handed over all of The Decedent

ALICE PEARSON JORGENSEN'S

stocks and bonds

to the Robert Gregory law firm , in person ,

which I doubt was handled properly ,

no Power of Attorney in place .

No inventory of said securities present

in Defendant's settlement option .

I also dispute the thirty thousand dollar

value as put

forth by Robert Gregory ,

such an even number

being impossible .

I hereby DEMAND

an Inventory

of all the Decedent's
Stocks and Bonds
delivered by hand
by myself
to Robert Gregory's law office .

14)
A CONFLICT OF INTEREST was admitted
by Robert Gregory to the Overseers .
I waive any secrecy requirement
imposed by the Overseers'
Julia Sheridan
in order to remove any doubt
of this .
Robert Gregory
joined forces with Lynch and Newman ,
in SECRECY .

15)
The defendants , herein et . al , ,
prepared a lien and a promissory note
to be used against the value of my property
at 1575 State Route 129 ,
South Bristol , Maine 04568
should I ever sell it .
\$20,000.00 dollars each .
I DEMAND an original signature
on both documents ,
otherwise known as a wet signature .

16)
The LIEN , copy attached ,
has not appeared
in the Registry of Deeds at the
Lincoln County Courthouse
at Wiscasset ,
Maine , to date . Furthermore ,
the LIEN lacks an original signature
required in Maine on
all real estate documents ,
Probate Documents included , with
certain exceptions such as
Power of Attorney
also various versions of Adobe ,
Acrobat , Sign , and others
with required registration
and documents attached
as needed .,
also known as "e signatures" .

17)
The PROMISSORY NOTE also lacks my
original signature ,
also known
as a wet signature in forensics

18)
The LIEN was prepared by
Tina Gardner - Best ,
employed at the

JSJ 24 OCT 24

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enrolled Alice in Harvard Business School .

26)

Thereafter Harvard , the Navy gave Alice a Commission of Lieutenant , junior grade , and tasked her as Paymaster and Disbursement Officer for the Naval Air Station , Patuxent River , Maryland , a job requiring a firearm be carried . Alice carried a cash drawer from the Drill Hall to the Cafeteria where Navy personnel could receive their paychecks and cash them if they wanted . Alice never drew her firearm .

27)

Alice met and married Lieutenant , junior grade , John Bernhardt Jorgensen , from Beverly , Massachusetts , a Navy pilot of some success , Aircraft Carrier Wasp , CV - 7 , 1942 ; then Aircraft Carrier Saratoga CV -3 , 1943 . The Wasp suffered multiple torpedo hits on 15 Sep 1942 and went to the bottom . Saratoga survived the war . Taking it upon himself , dad , helping Saratoga's crane crew , suffered multiple fractures of his right leg and returned to Patuxent River NAS for Test Pilot Training . There Alice and John B . met and married .

28)

Kathy came along in 1946 , then me 1947 , Peter , 52 or 53 , not sure .

29)

Family moves : NAS PAX R Maryland , Newport , Rhode Island ; Sanford , Florida , Pensacola Florida ; Lafayette , Rhode Island ; Norfolk , Virginia ; Alameda , California ; then back to Patuxent River Naval Air Station , then by sailboat to Long Island , New York . possibly not in exact order .

30)

Our family acquired 20 Preston Street , Huntington , New York in July of 1961 for \$33,000.00 .

31)

Grumman Aircraft of Bethpage , NY , employed dad .

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7 years of military industrial congressional complex
caused dad to
move to South Bristol , Maine .

32)

Buying from well known Oliver Wendell Holmes ,
dad purchased
the property from McDaniel to Longfellow
for twenty thousand dollars .
Some hackles were raised with the rock blasting
to start the foundation
for 1575 State Route 129
but they soothed
when it stopped . Early 1970s .

33)

Decedent Alice P . Jorgensen
maintained the premises at 20 Preston Street ,
taking a job as a page at the
Huntington Public Library , NY .

34)

Alice furthered her education at
C . W. Post College , earning her
Master's Degree in Library Sciences .
Alice became promoted
to Head of the Reference Department
at the Library ,
second to no public
library in Eastern Long Island , noted
for its' inventory of law
books ; New York Supplement ,
Federal Supplement and others
all kept up to date .
Of course , that litigious area held
College Law Libraries and
government law libraries as well .
(Eastern District of New York)

36)

Alice put in 23 years as a Public Servant at
Huntington Public Library , New York .

37)

After her retirement ,
The State University of New York
Hospital at Stony Brook
saved Alice's life with an
emergency operation .
A shortage of blood to Alice's brain
slowed her recovery .

38)

Shortly thereafter , Alice and
Kathy Jorgensen accommodated
Alice at the Wynwood assisted living facility near
Chapel Hill , North Carolina .

39)

December of 1998 , the University of
North Carolina Medical Center at

Chapel Hill
helped Alice with post op recovery ,
restoring Alice's ability
to drive an
automobile and take some world tours .

40)
Things went badly at Wynwood when
they lost their cook .
The way I heard it , the janitor handed out bologna
sandwiches but Alice didn't get hers .

41)
On September 30 , 1999 , Alice leased
Apartment # 908 at Coburg Village in
Rexford , New York , 12148 , as an
original tenant , Coburg had just opened up
under Lutheran management . 5 stars .

42)
At Alice's 90th birthday party
at Coburg Village ,
26 July , 2011 ,
Kathy Jorgensen
laid out an inconsiderate ,
shocking and depressing
announcement
They , Kathy , had tricked
Alice into signing
a termination of her lease document
on Apartment # 908 ,
terminating her lease and
giving her 20 days to move out .

43)
Kathy Jorgensen
did not show
Alice , in person ,
what she was getting in for
by their failure to take her to
High Point prior to her move .

43)
I was completely off balance at this
unfortunate development ,
if ever there were a
time to call a lawyer , that was it .

44)
When I explained to Alice
at her apartment ,
after the birthday party ,
what had happened ,
it produced anger
beyond measure for Alice ,
not soon to be forgotten .

45)
Alice immediately ended her joint bank accounts with
Kathy and before leaving Coburg . There is a
remainder of \$ 100 dollars languishing in the Fletcher

lost asset recovery company located at Roslyn , NY .
plus or minus . (attachment)

46)

On August 17 , 2011 , under
questionable and lamentable
circumstances at best ,
devious and criminal circumstances
in the worst light ,
Decedent Alice P . Jorgensen moved
from Apartment # 908 at
Coburg Village to High Point
Mental Asylum . Involuntary Commitment .

47)

At High Point Mental Asylum there were couples
hanging on to each other , wandering aimlessly ,
an unforgettable older lady in the common
room , advising everyone in a loud voice to
"Go to H*** " , (not heaven) .

48)

Contrast to Coburg Village ; Alice's neighbor
across the hall the former President of Rensselaer
Polytechnic Institute . Next door at Coburg Alice's
best friend Jane .

49)

Involuntary Commitment is covered under New York
State Mental Hygiene Law Sections 9.27 (a) and
9.27 (b) . From "New York State Involuntary
Commitment Laws" by Sandra King , reviewed by
Melissa McCall , J.D. , M . S. , .
In short , 2 letters signed by mental health
professionals being required with DANGER to self
and / or others being the over arching concern .

50)

Alice P . Jorgensen summarily refused incarceration
on her first day at High Point , saying in front of Peter ,
Kathy and John Jorgensen , (myself) , : "I'm not staying here" .

51)

Peter and Kathy scolded me with wagging pointed fingers
and I quote them verbatim : "don't you dare mess with our plans"
right in front of Alice .

52)

It took about ten days to prepare an exit strategy for Alice
and return the tractor trailer to Connecticut .

53)

The first thing Alice and I did when we got to Maine
was to go to Pemaquid Point Lighthouse and get
lobster rolls at the snack bar .

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ROMAN NUMERAL II

JURISDICTION AND VENUE

55)

This is a Civil Action for Money Damages against the Defendants , John Lynch , Matthew Newman , Robert Gregory , , Kathy Jorgensen inclusive , and their agents and employees .

56)

It arises out of the manufacture of questionable legal documents surrounding the Probate Case of Alice P . Jorgensen - Lincoln County Probate 2012 - 0221 , by the Defendants , (COMPLAINT NUMBER ONE) , Also ,

57)

The DISPUTE made by the Defendants against The Last Will and Testament of Alice P . Jorgensen , (COMPLAINT NUMBER TWO) , also ,

58)

an INTEREST TO DEFRAUD by Defendant Robert Gregory with no notification to myself , I was Robert Gregory's Client , and ,

59)

lacking my signature plus other procedural requirements .
n.b. , Robert Gregory created
A CONFLICT OF INTEREST
GENERATED IN SECRECY .
(COMPLAINT NUMBER THREE) .

60)

JURISDICTION over the subject matter of this case arises under Title 28 , United States Code , Section 1331 , and , Title 28 United States Code Section 1332 .

61)

This Court may properly assert personal Jurisdiction over all of the named Defendants because of their presence and activity in , and connections to , this forum .

Roman Numeral 111 (THREE) - VENUE .

62)

The Decedent , Alice P . Jorgensen , was a Representative of The

8.10

UNITED STATES GOVERNMENT
in times of WAR , from 1943 to 1945 .
Decedent Alice was entrusted with counting
and disbursing all monies
to all U . S . Navy personnel and civilians
at Naval Air Station ,
Patuxent River Maryland .

63)

I pray , due to the more northerly
latitude of the
United States District Court at Bangor ,
Maine and with its'
lesser case load , and with its'
reputation for fairness , and ,
in consideration of Alice P . Jorgensen's
prior service to
THE UNITED STATES GOVERNMENT ,
and
CIVIL SERVICE ,
is the
United States District Court at Bangor ,
Maine ,
review , with scrutiny , the proceedings of
Alice P . Jorgensen's Estate ,
Lincoln County Probate Case # 2012 - 0221

64)

Travel between South Bristol to the
Portland Court is complicated
by one construction site after another ,
prime time movement of
heavy traffic gives rise to
impatience by some
drivers .

65)

I am a senior citizen , although the miles
might be greater to drive through Augusta
from South Bristol
then continuing to
Bangor ,
the Route 95 corridor makes for
easier traveling .

66)

The Bangor Court has a non-discriminational
Public Library across the street
to which I have obtained
a library card .

67)

Augusta has legal facilities
and copy services .
I am seeking the assistance
of an attorney
in Augusta .

68)

Again , consideration given to

Yale Professor Eliot's
article recommending
minimal diversity
(Point / Paragraph 12) ,
above ,
Minimal diversity
will allow
an equal amount of fairness
to all .
Enlightened thinking can
include regarding
MINIMAL DIVERSITY
as a
CONSTITUTIONAL RIGHT .

69)
ATTORNEY MALPRACTICE may have a
remedy in State and Federal Law .

70)
Alice and I purchased N787D ,
a 4 seat Beechcraft Airplane , which
after Alice's passing ,
had to be sacrificed to pay bills ,
taxes , heat and electricity ,
to maintain the South Bristol house ,
a direct result off being denied
my inheritance ; below
market value .

71)
Bills never stop . I was forced to
take any small paying job
until I got another tractor trailer .

72)
On December 16 , 2000 , enjoying
a few days vacation , I entered the
South Bristol house and found
the aforementioned LIEN DOCUMENT
thumbtacked to the wall of my telephone
room . I IMMEDIATELY recognized
the FORGERY in its' makeup .
By now , Jorgensen's burglaries
had become a constant nuisance ,
no surprise at all how the
LIEN DOCUMENT got there .
Jorgensen may deny putting the
LIEN DOCUMENT in my house .
From there , I
approached the Overseers in
Augusta . It took me a
while to find them .

73)
After Alice moved to
North Carolina ,

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I started
 paying all the bills at
 20 Preston Street ,
 Huntington , NY . 7200 dollars
 a year to the town ,
 between all the rest ;
 telephone , electric , fuel oil ,
 new washer and dryer ,
 easily \$ 10,000.00
 (ten thousand dollars) .

74)

After Alice moved to North
 Carolina , Kathy
 contributed nothing towards
 the bills at Huntington , NY .

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75)

The blank space where the
 Defendants
 sought my acceptance of their
 SETTLEMENT AGREEMENT
 tells its' own story .

ROMAN NUMERAL IV (FOUR) - THE PARTIES .

PLAINTIFF , Pro Se ,
 John Scott Jorgensen ;
 Post Office Box 242 ,
 South Bristol , Maine 04568 .
 Telephone ~~631-508-1759~~
 jorgensenjxj@gmail.com .
 631-469-8220
 DEFENDANTS

STILL
 CURRENT
 ←

N.Y. : 115 MONTAUK HWY.
 EAST MORICHES NY
 LUFKER AIRPORT (F9N)
 11940 631-469-8220

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Kathy Jorgensen
 1723 Apache Street , Kill Devil Hill , North Carolina 27948
 Telephone : 336 512 0097 , email unknown

John Lynch
 and
 Matthew Newman

share an office at 19 Vine Street ,
 Damariscotta , Maine 04543
 Telephone : 207 563 1700
 fax : 207 563 3153 , email unknown

Robert Gregory , P.O. Box 760 ,
10 Water Street ,
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Federal Courts

Note 137 Harv. L. Rev. 1226

Federal Questions and the Probate Exception

- Volume 137
- Issue 4
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From time to time, contests over decedents' estates arrive in the federal courts. One such case began when a hotel magnate, dividing his empire among the children of his first and second marriages, appointed an executor in his will.¹ As a daughter of the second marriage saw it, the executor administered the estate in a way that favored the children of the first marriage.² So she sued — alleging, among other things, “fraudulent interstate communications” that entitled her to recover under the Racketeer Influenced and Corrupt Organizations Act³ (RICO).⁴ To hear her claims, she chose a federal district court.⁵

Whether a federal court may hear such claims, however, turns on the “probate exception.” The exception says that federal courts lack subject matter jurisdiction to probate wills or to administer decedents' estates.⁶ But the boundaries of this principle are far from clear. Whether the probate exception can apply at all to a claim under a federal law like RICO is a question almost unexplored,⁷ a particularly hidden turn within “one of the most mysterious and esoteric branches of the law of federal jurisdiction.”⁸ Decisions often steer around the issue altogether, as the court of appeals did when it encountered the